



State of Washington
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CREDIT UNIONS

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Agenda

Teleconference with Division of Credit Unions (DCU) and the National Credit Union Administration

On September 7, 2017 from 2:30 pm to 3:00 pm

Purpose: Introduce to NCUA Region 5 the proposed state MBL rule

Discussion:

1. Introductions of DCU & NCUA participants on call
Participants from Department of Financial Institutions:
 - Linda Jekel, Director of Credit Unions
 - Joe Vincent, Director of Regulatory & Legal Affairs
 - Catherine Mele-Hetter, Director of Legislative Affairs
 - Doug Lacy-Roberts, Program Manager of Special Exams and Enforcement
2. Explain intent of the state's proposed rule is to update & modernize state requirements, while creating a hybrid of state's prescriptive requirements and NCUA's principle-based rule)
3. In general, describe Washington State's rule-making process
 - a) CR 101(inquiry, drafting & public meetings), extensive stakeholder work started April 2016, suspended in September 2016, resumed in April 2017
 - b) Submit proposed rule to NCUA for approval
 - c) CR 102 (public hearing on final draft approved by NCUA)
 - d) CR 103 (final proposed draft for adoption)
 - e) Proposed rule becomes effective 31 days after filing CR 103 in published in Federal Register
4. Explain proposed rule format, especially numbering is different than federal rules (document starts with existing state rule and show tracked changes for proposed amendments, i.e. ~~strikeout~~ for deleted, underline for new language)
5. Give disclaimer, comments were added in the side margin of proposed rule for discussion purposed to identify where language is the same or similar to 12 CFR 723 (based on our best effort)
6. Decide next steps
Suggestions:
 - a) Next two weeks, NCUA Region 5 read through proposed rule and determine what sections are same or sufficiently similar that don't need further discussion. Highlight areas for further discussion with DCU.

- b) Linda Jekel meet with NCUA Region 5 in Tempe in late September for further discussion as needed.